

**TROY LAW, PLLC**

**MEMO ENDORSED**

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July 20, 2023

**Via ECF**

Hon. Edgardo Ramos, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

The hearing previously scheduled for July 25, 2023 at 10:00 AM is hereby rescheduled to July 25, 2023 at 2:30 PM. Counsel for plaintiffs is directed to serve this order upon the defendants by close of business today, July 21, 2023. SO ORDERED.

  
Edgardo Ramos, U.S.D.J.  
Dated: July 21, 2023  
New York, New York

**Re: Plaintiffs Letter Requesting Adjournment of Conference and Order to Show Cause**

**Hearing on July 25, 2023 to later time:**

1:18-cv-05448-ER *Qiu et al v. Shanghai Cuisine, Inc. et al*

Your Honor,

We represent the Plaintiffs in the above referenced matter. We write respectfully and pursuant to Your Honors Orders dated July 17, 2023, and July 18, 2023, stating that the court will hold a conference and Order to Show Cause Hearing on July 25, 2023, at 10:00 am in the matter. Plaintiff respectfully request to adjourn the Order to Show Cause Hearing and Conference to a time in the afternoon on July 25, 2023, preferably after 2:00 pm. Plaintiff has a couple scheduling conflicts with the Conference and Order to Show Cause Hearing and therefore will have some problem attending. This is plaintiff's first request and granting such a request will not prejudice any party in the matter.

On July 17, 2023, the court granted plaintiffs Motion for Conference and stated that the parties should appear for an in-person conference on July 25, 2023, at 10:00 am. Further, on July 18, 2023, the court Ordered Defendants to Show Cause and stated that the Hearing will be held on July 25, 2023, at 10:00 am in person. Plaintiff has some scheduling conflicts in the matter and for this reason plaintiff respectfully requests for an adjournment of the Conference and Order to Show Cause Hearing to a later time in the day, specifically after 2:00 pm. At the moment plaintiff has to appear in Long Island Supreme Courthouse for a in-person conference in the matter of *Tong Fu Kiang v. Yummy Oriental Restaurant Inc et al.* 603291/2022, at 09:00 am. Further plaintiff has another conference via telephone in the bankruptcy matter of *Heng Li Zhu*, 19-11870-jlg, at 10:00 am. With plaintiff having a telephone conference directly at the time of your Honors conference and another conference at 09:00 am in Nassau County, plaintiff believe that they will not have enough time to either travel from Nassau County to the Southern District Courthouse to attend Your Honors conference. For these reasons plaintiff request that the court adjourn the conference to a later time after 2:00 pm so plaintiff can have enough time to travel from Long Island to the Southern District Courthouse to attend Your Honors Conference. Such request will not prejudice any party in the matter, and this is plaintiffs first request. Plaintiffs have reached out to defendants regarding the request, and they have not responded back to plaintiff.

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For the reasons stated above, plaintiff respectfully request to adjourn the Order to Show Cause Hearing and Conference scheduled on July 25, 2023, at 10:00 am to a later time in the day, preferably any time after 02:00 pm.

We thank the court for its time and consideration in this matter and apologize for the inconvenience that may be caused.

Respectfully Submitted,  
TROY LAW, PLLC  
/s/John Troy  
John Troy, Esq.

Cc: all counsel of record *via ECF*

*JT/gd*